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September 1, 2023

Hon. Sanket J. Bulsara
United States Magistrate Judge
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Dear Judge Bulsara:

In compliance with the court's order of August 18, 2023, here follows the plaintiff's list of witnesses:

Stephen LoCurto
MDC Brooklyn

Lisa LoCurto
45 Jamie Court
Suffern, New York 01901
845-772-7002

Harry Batchelder, Jr., Esq.
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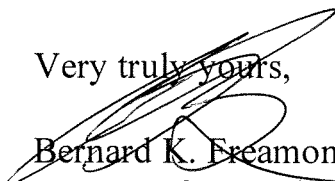
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Clerk
United States District Court
Eastern District of New York
225 Cadman Plaza East
New York, New York 11201

Plaintiff may not call all of these witnesses but, out an abundance of caution, he is listing each of them now. Plaintiff will also rely on documentary evidence and other matters in the record of both the 2255 petition and the underlying criminal case, especially matters that the court can take judicial notice of under F.R. E. 201 but he will object to the use of any documentary evidence, affidavits, or other written material offered to prove any contested fact.

Very truly yours,



Bernard K. Freeman, Esq.
Attorney for Stephen LoCurto